

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Application of California-American Water  
Company (U210W) for Approval of the  
Monterey Peninsula Water Supply Project and  
Authorization to Recover All Present and Future  
Costs in Rates

Application No. 12-04-019  
(Filed April 23, 2012)

**JOINT MOTION OF SETTLING PARTIES  
FOR GROUNDWATER MODELING WORKSHOPS**

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**JOINT MOTION OF SETTLING PARTIES  
FOR GROUNDWATER MODELING WORKSHOPS**

**I. INTRODUCTION AND BACKGROUND**

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), California American Water, City of Pacific Grove, Coalition of Peninsula Businesses, County of Monterey, Landwatch Monterey County, Monterey County Farm Bureau, Monterey County Water Resources Agency, Monterey Peninsula Regional Water Authority, Monterey Peninsula Water Management District, Monterey Regional Water Pollution Control Agency, Planning and Conservation League Foundation, Public Water Now (formerly Citizens for Public Water), Salinas Valley Water Coalition, Sierra Club, and Surfrider Foundation (collectively the “Moving Parties”)<sup>1</sup> submit this joint motion to request workshops in the above-captioned proceeding.<sup>2</sup> The Moving Parties request these workshops be held to

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<sup>1</sup> California American Water files this motion on behalf of the above-named parties and provides electronic signatures in accordance with Rule 1.8 of the Commission’s Rules of Practice and Procedure.

<sup>2</sup> On July 31, 2013, sixteen parties to the above-captioned proceeding entered into a large Settlement Agreement in an effort to avoid litigating disputes over certain issues, including how to assess impacts of the Monterey Peninsula Water Supply Project source water intake on seawater intrusion and fresh

review and discuss the groundwater modeling used by the Commission's Environmental Review Team in its environmental review of the Monterey Peninsula Water Supply Project ("MPWSP").

The Commission's Environmental Review Team's Draft Environmental Impact Report ("DEIR") for the MPWSP was made available to the public on April 30, 2015 for a 60-day public comment period. The DEIR, among other things, analyzed the significance of environmental effects from the MPWSP's construction and operation of slant wells. The Commission's Environmental Review Team retained Geosciences Support Services Incorporated to conduct the computer modeling to "evaluate how project implementation would influence the local and regional groundwater behavior over time."<sup>3</sup> The groundwater modeling was the primary analytical tool used to evaluate project impacts on groundwater resources.

#### **IV. DISCUSSION**

The Moving Parties would like to better understand the models used to develop the DEIR's conclusions regarding the MPWSP's impacts on SRGB groundwater. The Moving Parties request workshops in order to have the Environmental Review Team present the groundwater modeling to the parties, explain the inputs used to run the models, and to discuss the model's results. At the workshops, parties could also discuss whether and how additional scenarios could be run with the existing models so that parties can better understand the models. To this end, the workshop would be divided into two sessions. During the first session, the parties would identify additional model runs to be made by Geosciences. Additionally, the parties would identify displays of model inputs and outputs that would be useful for

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groundwater availability in the Salinas River Groundwater Basin ("SRGB"). Many, but not all, of the settling parties join this motion.

<sup>3</sup> Draft Environmental Impact Report, made available on April 30, 2015 at [http://www.cpuc.ca.gov/Environment/info/esa/mpwsp/deir\\_toc.html](http://www.cpuc.ca.gov/Environment/info/esa/mpwsp/deir_toc.html) , section 4.4, Groundwater Resources, pp. 39-40; *See id.*, pp. 40-52 for discussion of groundwater modeling.

understanding the models. Those identifications would include specification of the formats for displaying the inputs and outputs. Following the first session, Geosciences would make the model runs and prepare the input and output displays identified during the preceding workshop session. During the second workshop session, Geosciences would present the results of the model runs to the parties.

The Moving Parties request that the first workshop session be held on May 18 or May 19, 2015, or as soon as possible thereafter, and the second session be scheduled by the parties at the end of the first workshop. The Moving Parties request the workshops be scheduled in a timely manner in order for parties to apply the knowledge gained from the workshop to their comments on the DEIR, which are due by July 1, 2015. Additionally, the Moving Parties request that both workshops be held at the Commission's San Francisco offices or another convenient location.

### **III. CONCLUSION**

As set forth in this joint motion, the Moving Parties respectfully request the Commission to schedule workshops on the groundwater modeling underlying the DEIR's findings on the MPSWP's impacts on groundwater resources.

Respectfully submitted,

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